

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<b>In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION</b>	:	12-md-02311
<b>In Re: All Auto Parts Cases</b>	:	Honorable Marianne O. Battani
<b>THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES</b>	:	2:12-MD-02311-MOB-MKM

**DEFENDANTS’ OPPOSITION TO MOTION TO INTERVENE**

The undersigned Defendants hereby submit this opposition to the Motion to Intervene (“Motion”) submitted by Timmy A. Curtis, Amber Lambert, and Jonathon Rich (“Movants”). Because Movants fail to provide any basis for their Motion, the Motion should be denied. Further, at least one of the Movants has a long and litigious history of filing frivolous intervention motions that have been denied repeatedly by courts across the country.

Movants seek intervention as of right under Federal Rule of Civil Procedure 24(a) as well as permissive intervention under Rule 24(b). *See* Dkt No. 930 (hereinafter, “Mot.”). In the Motion, Movants argue that they “have a common vested interest in this litigation” and state that they will provide “questions of laws and Facts that are common in this Litigation in support of plaintiffs [*sic*] claims.” Mot. at 1. Even applying the principle that *pro se* complaints are to be held to less

stringent standards than formal pleadings drafted by lawyers, and should therefore be liberally construed, *see Williams v. Curtin*, 631 F.3d 380, 383 (6th Cir. 2011), the statements in the Motion are entirely conclusory and insufficient to satisfy the requirements of Rule 24.

As an initial matter, under Rule 24(c), a motion to intervene, whether as of right or for permissive intervention, “must state the grounds for intervention and be accompanied by a pleading that sets out the claim or defense for which intervention is sought.” The movant must describe the basis for intervention with “sufficient specificity to allow the district court to rule.” *Beckman Indus., Inc. v. Int’l Ins. Co.*, 966 F.2d 470, 475 (9th Cir. 1992). Here, in addition to not being accompanied by a pleading, the Motion provides only a conclusory recitation of one element of permissive intervention without specifying for which claim or defense intervention is sought. *See* Mot. at 1 (“Intervenors will provide questions of laws and Facts that are common in this Litigation.”). On this basis alone, the Motion should be denied.

In addition, even construing the Motion liberally, Movants have not provided any basis for intervention under either Rule 24(a)(2) or Rule 24(b). The Sixth Circuit has held that, “to intervene as of right under Rule 24(a)(2), a proposed intervenor must establish the following four elements: (1) the motion to intervene is timely; (2) the proposed intervenor has a substantial legal interest in

the subject matter of the case; (3) the proposed intervenor's ability to protect that interest may be impaired in the absence of intervention; and (4) the parties already before the court may not adequately represent the proposed intervenor's interest." *United States v. Michigan*, 424 F.3d 438, 443 (6th Cir. 2005). Further, "failure to meet one of the criteria will require that the motion to intervene be denied." *Id.* (quoting *Grubbs v. Norris*, 870 F.2d 343, 345 (6th Cir.1989)). Movants here fail to establish even one of these four requirements. They have not alleged any facts supporting a legitimate connection to the underlying litigation, much less a substantial legal interest in the subject matter of the case. *See Am. Special Risk Ins. Co. ex rel. S. Macomb Disposal Auth. v. City of Centerline*, 69 F. Supp. 2d 944, 955 (E.D. Mich. 1999) (denying motion to intervene as of right because, among other things, proposed intervenor failed to illustrate how its interests would be impaired if it was not allowed to intervene). Moreover, the Motion fails to articulate why Movants believe that Co-Lead Class Counsel may not adequately protect their interests. *Id.*

Movants similarly fail to make a case for permissive intervention. Permissive intervention requires that the proposed intervenor have (1) "a conditional right to intervene by a federal statute," or (2) "a claim or defense that shares with the main action a common question of law or fact." Fed. R. Civ. P. 24(b)(1). In the Motion, Movants fail to identify the specific "claim or defense"

they purport to assert. Nor do Movants identify any federal statute under which they have a conditional right to intervene.

As demonstrated, there is no basis on which to allow intervention by Movants under Rule 24(a)(2) or Rule 24(b), and the Motion should be denied.

It is not surprising that Movants have entirely failed to construct a request for intervention satisfying even the most basic requirements for that relief. The Movants have a history of filing frivolous motions. *See, e.g., Order Denying Mot. to Intervene* at 2 n.4, *Oracle Am., Inc. v. Tetrix Computer Co.*, Case No. 5:13-cv-03385-PSG (N.D. Ca. Mar. 25, 2015), ECF No. 571 (denying motion by Movants to intervene and noting that Movant Jonathan Riches has a “long and litigious history filing frivolous lawsuits in courts across the country.”) The results of an ECF/Pacer USParty/Case Index Search conducted on April 9, 2015, for “Riches, Jonathan Lee” indicated that Mr. Riches has been a party to 3,670 cases. *See* <http://pacer.psc.uscourts.gov> (follow “Case Search Sign In” hyperlink); *see also Report and Recommendation of United States Magistrate Judge* at 3, *Solliday v. Dir. of Bureau of Prisons*, Case No. 0:11-cv-02350-MJD-JJG (D. Minn. Oct. 8, 2014), ECF No. 56 (providing results of an ECF/Pacer USParty/Case Index Search for “Riches, Jonathan Lee” as of October 8, 2014), *adopted in Amended Order on Report and Recommendation* (D. Minn. Nov. 17, 2014), ECF No. 59. In fact, Movant “Jonathon Rich” has been restricted by several courts, including Judge

Ludington of this Court, from filing future documents in those courts unless he first obtains permission of the court or unless any such filing is signed by a licensed attorney:

Accordingly, IT IS HEREBY RECOMMENDED that . . . An order be issued further restricting the proposed filings of Jonathan Lee Riches (a.k.a. Jonathan Rich, Rich Jonny Lee, Gordon Gekko, Ryan Howard, Mats Sundin, Trevor Wikre, or anyone signing with Inmate Identification Number KX9662) by directing the Clerk of Court for the District of Minnesota to refuse **any type of filings** submitted by Mr. Riches unless he receives permission to file the proposed document from a United States Magistrate Judge or unless the document is signed by a licensed attorney . . . .

*Id.* at 2-4, 8 (emphasis added); *see also Order Adopting Magistrate Judge's Report and Recommendation, Dismissing Plaintiff's Complaint with Prejudice and Enjoining Plaintiff From Filing Future Actions Without Leave of the Court, Riches v. Aguilera*, Case No. 1:07-cv-14460-TLL-CEB (E.D. Mich. Feb. 5, 2008), ECF. No. 4.

Accordingly, for the reasons set forth above, the undersigned Defendants respectfully submit that Movants' Motion should be denied.

Dated: April 20, 2015

Respectfully submitted,

By: /s/ Steven A. Reiss

Steven A. Reiss  
Adam C. Hemlock  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153-0119  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
steven.reiss@weil.com  
adam.hemlock@weil.com

Frederick R. Juckniess  
SCHIFF HARDIN LLP  
350 South Main Street, Suite 210  
Ann Arbor, MI 48104  
(734) 222-1504  
fjuckniess@schiffhardin.com

***Attorneys for Bridgestone Corporation and  
Bridgestone APM Company***

Dated: April 20, 2015

By: /s/ Steven A. Reiss

Steven A. Reiss  
Adam C. Hemlock  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153-0119  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
[steven.reiss@weil.com](mailto:steven.reiss@weil.com)  
[adam.hemlock@weil.com](mailto:adam.hemlock@weil.com)

Fred K. Herrmann  
Joanne G. Swanson  
Matthew L. Powell  
KERR RUSSELL & WEBER PLC  
500 Woodward Avenue  
Suite 2500  
Detroit, MI 48226  
Tel. (313) 961-0200  
Fax (313) 961-0388  
[fherrmann@kerr-russell.com](mailto:fherrmann@kerr-russell.com)  
[jswanson@kerr-russell.com](mailto:jswanson@kerr-russell.com)  
[mpowell@kerr-russell.com](mailto:mpowell@kerr-russell.com)

***Attorneys for Calsonic Kansei Corporation  
and CalsonicKansei North America, Inc.***

BUTZEL LONG

Dated: April 20, 2015

By: /s/ Sheldon H. Klein

Sheldon H. Klein  
David F. DuMouchel  
George B. Donnini  
BUTZEL LONG  
150 West Jefferson, Suite 100  
Detroit, MI 48226  
(313) 225-7000  
(313) 225-7080 (facsimile)  
[klein@butzel.com](mailto:klein@butzel.com)

W. Todd Miller  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave., NW, Suite 300  
Washington, DC 20037  
Telephone: (202)663-7820  
[TMiller@bakerandmiller.com](mailto:TMiller@bakerandmiller.com)

***Attorneys for Defendants Tokai Rika Co.,  
Ltd. and TRAM, Inc.***

ARNOLD & PORTER LLP

Dated: April 20, 2015

By: /s/ James L. Cooper

James L. Cooper  
Michael A. Rubin  
Laura Cofer Taylor  
Katherine Clemons  
ARNOLD & PORTER LLP  
555 Twelfth Street NW  
Washington, DC 20004  
(202) 942-5000  
(202) 942-5999 (facsimile)  
[james.cooper@aporter.com](mailto:james.cooper@aporter.com)  
[michael.rubin@aporter.com](mailto:michael.rubin@aporter.com)  
[laura.taylor@aporter.com](mailto:laura.taylor@aporter.com)  
[katherine.clemons@aporter.com](mailto:katherine.clemons@aporter.com)

Joanne Geha Swanson  
Fred K. Herrmann  
Matthew L. Powell  
KERR, RUSSELL AND WEBER, PLC  
500 Woodward Avenue, Suite 2500  
Detroit, MI 48226  
(313) 961-0200  
(313) 961-0388 (facsimile)  
[jswanson@kerr-russell.com](mailto:jswanson@kerr-russell.com)  
[fherrmann@kerr-russell.com](mailto:fherrmann@kerr-russell.com)  
[mpowell@kerr-russell.com](mailto:mpowell@kerr-russell.com)



***Attorneys for Defendants Fujikura Ltd.  
and Fujikura Automotive America LLC***

SQUIRE PATTON BOGGS

Dated: April 20, 2015

By: /s/ Barry A. Pupkin

Barry A. Pupkin  
SQUIRE PATTON BOGGS  
2550 M Street Northwest  
Washington, D.C. 20037  
United States of America  
(202) 626-6662  
(202) 457-6315 (facsimile)  
[barry.pupkin@squirepb.com](mailto:barry.pupkin@squirepb.com)

***Attorney for Defendants Aisan Corporation  
of America and Franklin Precision  
Industry***

ARNOLD & PORTER LLP

Dated: April 20, 2015

By: /s/ Franklin R. Liss

Franklin R. Liss  
Barbara H. Wootton  
Tiana Russell  
Lauren K. Peay  
ARNOLD & PORTER LLP  
555 Twelfth Street NW  
Washington, DC 20004  
Tel: (202) 942-5969  
Fax: (202) 942-5999  
[frank.liss@aporter.com](mailto:frank.liss@aporter.com)  
[barbara.wootton@aporter.com](mailto:barbara.wootton@aporter.com)  
[tiana.russell@aporter.com](mailto:tiana.russell@aporter.com)  
[lauren.peay@aporter.com](mailto:lauren.peay@aporter.com)

Howard B. Iwrey  
Brian M. Moore  
DYKEMA GOSSETT PLLC

39577 Woodward Ave., Suite 300  
Bloomfield Hills, MI 48304  
(248) 203-0700  
(248) 203-0763 (facsimile)  
[hiwrey@dykema.com](mailto:hiwrey@dykema.com)  
[bmoore@dykema.com](mailto:bmoore@dykema.com)

***Attorneys for Defendants Koito  
Manufacturing Co., Ltd., and North  
American Lighting, Inc.***

WINSTON & STRAWN LLP

Dated: April 20, 2015

By: /s/ A. Paul Victor

A. Paul Victor  
Jeffrey L. Kessler  
Jeffrey J. Amato  
James F. Lerner  
Molly M. Donovan  
Elizabeth A. Cate  
WINSTON & STRAWN LLP  
200 Park Avenue  
New York, NY 10166  
(212) 294-6700  
(212) 294-4700 (facsimile)  
[pvictor@winston.com](mailto:pvictor@winston.com)  
[jkessler@winston.com](mailto:jkessler@winston.com)  
[jamato@winston.com](mailto:jamato@winston.com)  
[jlerner@winston.com](mailto:jlerner@winston.com)  
[mmdonovan@winston.com](mailto:mmdonovan@winston.com)  
[ecate@winston.com](mailto:ecate@winston.com)

Fred K. Hermann  
Joanne G. Swanson  
Dwayne D. Stresman  
KERR, RUSSELL AND WEBER  
500 Woodward, Suite 2500  
Detroit, MI 48226-3427  
(313) 961-0200  
(313) 961-0388 (facsimile)

[fherrmann@kerr-russell.com](mailto:fherrmann@kerr-russell.com)  
[jswanson@kerr-russell.com](mailto:jswanson@kerr-russell.com)  
[dstreman@kerr-russell.com](mailto:dstreman@kerr-russell.com)

***Attorneys for Defendants NTN  
Corporation and NTN USA Corporation***

ARNOLD & PORTER LLP

Dated: April 20, 2015

By: /s/ James L. Cooper

James L. Cooper  
Danielle Garten  
Adam Pergament  
ARNOLD & PORTER LLP  
555 Twelfth Street NW  
Washington, DC 20004  
(202) 942-5000  
(202) 942-5999 (facsimile)  
[james.cooper@aporter.com](mailto:james.cooper@aporter.com)  
[danielle.garten@aporter.com](mailto:danielle.garten@aporter.com)  
[adam.pergament@aporter.com](mailto:adam.pergament@aporter.com)

Joanne Geha Swanson  
Fred K. Herrmann  
KERR, RUSSELL AND WEBER, PLC  
500 Woodward Avenue, Suite 2500  
Detroit, MI 48226  
(313) 961-0200  
(313) 961-0388 (facsimile)  
[jswanson@kerr-russell.com](mailto:jswanson@kerr-russell.com)  
[fherrmann@kerr-russell.com](mailto:fherrmann@kerr-russell.com)

***Attorneys for Defendants Yamashita  
Rubber Co., Ltd., and YUSA Corporation***

SHEARMAN & STERLING LLP

Dated: April 20, 2015

By: /s/ Heather Lamberg Kafele

Heather Lamberg Kafele  
Keith Palfin  
Alison R. Welcher  
SHEARMAN & STERLING LLP  
801 Pennsylvania Avenue, NW, Suite  
900  
Washington, DC 20004  
(202) 508-8000  
(202) 508-8100 (facsimile)  
[hkafele@shearman.com](mailto:hkafele@shearman.com)  
[keith.palfin@shearman.com](mailto:keith.palfin@shearman.com)  
[alison.welcher@shearman.com](mailto:alison.welcher@shearman.com)

Brian M. Akkashian  
PAESANO AKKASHIAN, PC  
132 North Old Woodward Avenue  
Birmingham, MI 48009  
(248) 792-6886  
(248) 792-6885 (facsimile)  
[bakkashian@paesanoakkashian.com](mailto:bakkashian@paesanoakkashian.com)

***Attorneys for Defendants JTEKT  
Corporation, JTEKT North America  
Corporation, and JTEKT Automotive  
North America, Inc.***

REED SMITH LLP

Dated: April 20, 2015

By: /s/ Debra H. Dermody

Debra H. Dermody  
Michelle A. Mantine  
REED SMITH LLP  
225 Fifth Avenue  
Pittsburgh, PA 15222  
(412) 288-3302  
(412) 288-3063 (facsimile)  
[ddermody@reedsmith.com](mailto:ddermody@reedsmith.com)  
[mmantine@reedsmith.com](mailto:mmantine@reedsmith.com)

DYKEMA GOSSETT PLLC

Dated: April 20, 2015

By: /s/ Howard B. Iwrey

Howard B. Iwrey (P39635)  
Brian M. Moore (P58584)  
39577 Woodward Avenue  
Bloomfield Hills, Michigan 48304  
Telephone: (248) 203-0526  
Fax: (248) 203-0763  
[hiwrey@dykema.com](mailto:hiwrey@dykema.com)  
[bmoore@dykema.com](mailto:bmoore@dykema.com)

***Attorneys for Defendant for SKF USA Inc.***

O'MELVENY & MYERS LLP

Dated: April 20, 2015

By: /s/ Michael Tubach

Michael F. Tubach  
O'MELVENY & MYERS LLP  
Two Embarcadero Center, 28th Floor  
San Francisco, CA 94111  
(415) 984-8700  
(415) 984-8701 (facsimile)  
[mtubach@omm.com](mailto:mtubach@omm.com)

Michael R. Turco  
BROOKS WILKINS SHARKEY &  
TURCO PLLC  
401 South Old Woodward, Suite 400  
Birmingham, MI 48009  
(248) 971-1713  
(248) 971-1801 (facsimile)  
[turco@bwst-law.com](mailto:turco@bwst-law.com)

***Attorneys for Defendants LEONI Wiring  
Systems, Inc. and Leonische Holding Inc.***

COVINGTON & BURLING LLP

Dated: April 20, 2015

By: /s/ Anita F. Stork

Anita F. Stork  
Gretchen Hoff Varner  
Cortlin H. Lannin  
COVINGTON & BURLING LLP  
One Front Street, 35th Floor  
San Francisco, CA 94111  
Telephone: (415) 591-6000  
Fax: (415) 955-6550  
astork@cov.com

Michael J. Fanelli  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, D.C. 20001  
Telephone: (202) 662-6000  
Fax: (202) 662-5383  
Mfanelli@cov.com

***Attorneys for Defendants Alps Electric Co.,  
Ltd.; Alps Electric (North America), Inc.;  
and Alps Automotive, Inc.***

BROOKS WILKINS SHARKEY &  
TURCO PLLC

Dated: April 20, 2015

By: /s/ Maureen T. Taylor

Herbert C. Donovan (P51939)  
Maureen T. Taylor (P63547)  
BROOKS WILKINS SHARKEY &  
TURCO PLLC  
401 Old South Woodward, Suite 400  
Birmingham, MI 48009  
Telephone: (248) 971-1721  
Fax: (248) 971-1801  
taylor@bwst-law.com  
donovan@bwst-law.com

***Attorneys for Defendants Alps Electric Co.,  
Ltd.; Alps Electric (North America), Inc.;  
and Alps Automotive, Inc.***

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

Dated: April 20, 2015

By: /s/ Teale Toweill

Teale Toweill

Mark Leddy

Jeremy Calsyn

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

2000 Pennsylvania Ave., NW, Suite  
9000

Washington, DC 20006

(202) 974-1500

(202) 974-1999 (facsimile)

ttoweill@cgsh.com

mleddy@cgsh.com

jcalsyn@cgsh.com

***Attorneys for Defendant NSK, Ltd.***

GIBSON, DUNN & CRUTCHER LLP

Dated: April 20, 2015

By: /s/ George A. Nicoud III

George A. Nicoud III

Austin Schwing

Stuart McPhail

GIBSON, DUNN & CRUTCHER LLP

555 Mission Street, Suite 3000

San Francisco, CA 94105

(415) 393-8200

(415) 393-8306 (facsimile)

[tnicoud@gibsondunn.com](mailto:tnicoud@gibsondunn.com)

[aschwing@gibsondunn.com](mailto:aschwing@gibsondunn.com)

[smcphail@gibsondunn.com](mailto:smcphail@gibsondunn.com)

***Attorneys for Defendants American  
Mitsuba Corporation and Mitsuba  
Corporation***

WILMER CUTLER PICKERING HALE  
AND DORR LLP

Dated: April 20, 2015

By: /s/ Steven F. Cherry

Steven F. Cherry

Patrick J. Carome

David P. Donovan

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

Telephone: (202) 663-6000

Fax: (202) 663-6363

[steven.cherry@wilmerhale.com](mailto:steven.cherry@wilmerhale.com)

[patrick.carome@wilmerhale.com](mailto:patrick.carome@wilmerhale.com)

[david.donovan@wilmerhale.com](mailto:david.donovan@wilmerhale.com)

***Attorneys for Defendants DENSO  
International America, Inc. and DENSO  
Corporation***



WILMER CUTLER PICKERING HALE  
AND DORR LLP

Dated: April 20, 2015

By: /s/ Eric J. Mahr

Eric J. Mahr  
Stacy E. Frazier  
WILMER CUTLER PICKERING  
HALE AND  
DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 663-6000  
(202) 663-6363 (facsimile)  
[eric.mahr@wilmerhale.com](mailto:eric.mahr@wilmerhale.com)  
[stacy.frazier@wilmerhale.com](mailto:stacy.frazier@wilmerhale.com)

***Attorneys for Defendant Schaeffler USA***

PORTER WRIGHT MORRIS & ARTHUR  
LLP

Dated: April 20, 2015

By: /s/ Donald M. Barnes

Donald M. Barnes  
Jay L. Levine  
John C. Monica  
Molly S. Crabtree  
Jason E. Starling  
PORTER, WRIGHT, MORRIS, &  
ARTHUR, LLP  
1900 K Street, NW, Suite 1110  
Washington, D.C. 20006  
Telephone: (202) 778-3000  
Facsimile: (202) 778-3063  
[dbarnes@porterwright.com](mailto:dbarnes@porterwright.com)  
[jlevine@porterwright.com](mailto:jlevine@porterwright.com)  
[jmonica@porterwright.com](mailto:jmonica@porterwright.com)  
[mcrabtree@porterwright.com](mailto:mcrabtree@porterwright.com)  
[jstarling@porterwright.com](mailto:jstarling@porterwright.com)

***Attorneys for Defendants G.S. Electech,  
Inc., G.S. Wiring Systems, Inc., and G.S.W.  
Manufacturing, Inc.***

SIDLEY AUSTIN LLP

Dated: April 20, 2015

By: /s/ David C. Giardina

David C. Giardina  
Courtney A. Rosen  
SIDLEY AUSTIN LLP  
One S. Dearborn St.  
Chicago, IL 60603  
Tel.: (312) 853-7000  
Fax: (312) 853-7036  
[dgiardina@sidley.com](mailto:dgiardina@sidley.com)  
[crosen@sidley.com](mailto:crosen@sidley.com)

Bradley J. Schram  
HERTZ SCHRAM PC  
1760 S. Telegraph Rd., Suite 300  
Bloomfield Hills, MI 48302  
Tel.: (248) 335-5000  
Fax: (248) 335-3346  
[bschram@hertzschr.com](mailto:bschram@hertzschr.com)

***Counsel for Defendants Toyo Tire &  
Rubber Co., Ltd., Toyo Automotive Parts  
(USA), Inc., Toyo Tire North America OE  
Sales LLC, and Toyo Tire North America  
Manufacturing Inc.***

LATHAM & WATKINS

Dated: April 20, 2015

By: /s/ Marguerite M. Sullivan

Marguerite M. Sullivan  
Kelsey A. McPherson  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004  
(202) 637-2200

(202) 637-2201 (facsimile)  
[marguerite.sullivan@lw.com](mailto:marguerite.sullivan@lw.com)

Daniel M. Wall  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
(415) 395-0600  
(415) 395-8095 (facsimile)  
[dan.wall@lw.com](mailto:dan.wall@lw.com)

David D. Cross  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 624-2500  
(202) 628-5116 (facsimile)  
[dcross@crowell.com](mailto:dcross@crowell.com)

William H. Horton  
GIARMARCO, MULLINS &  
HORTON, P.C.  
101 West Big Beaver Road, Tenth Floor  
Troy, MI 48084-5280  
(248) 457-7060  
[bhorton@gmhlaw.com](mailto:bhorton@gmhlaw.com)

***Attorneys for Defendants Sumitomo  
Electric Industries, Ltd.; Sumitomo Wiring  
Systems, Ltd.; Sumitomo Electric Wiring  
Systems, Inc.; and Sumitomo Wiring  
Systems (U.S.A.) Inc.***

MORGAN, LEWIS & BOCKIUS LLP

Dated: April 20, 2015

By: /s/ J. Clayton Everett  
J. Clayton Everett  
Eyitayo O. St. Matthew-Daniel  
MORGAN, LEWIS & BOCKIUS LLP  
101 Park Avenue

New York, NY 10178  
212-309-7156  
Fax: 212-309-6001  
[jeverett@morganlewis.com](mailto:jeverett@morganlewis.com)  
[tstmatthew-daniel@morganlewis.com](mailto:tstmatthew-daniel@morganlewis.com)

***Attorneys for Defendants Sumitomo Riko  
Co., Ltd. and DTR Industries, Inc.***

SCHIFF HARDIN LLP

Dated: April 20, 2015

By: /s/ Robert J. Wierenga  
Robert J. Wierenga  
Suzanne L. Wahl  
SCHIFF HARDIN LLP  
340 South Main Street, Suite 210  
Ann Arbor, MI 48104  
(734) 222-1500  
(734) 222-1501 (facsimile)  
[rwierenga@schiffhardin.com](mailto:rwierenga@schiffhardin.com)  
[swahl@schiffhardin.com](mailto:swahl@schiffhardin.com)

David M. Zinn  
John E. Schmidlein  
Samuel Bryant Davidoff  
William Vigen  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
(202) 434-5648  
(202) 434-5029 (facsimile)  
[dzinn@wc.com](mailto:dzinn@wc.com)  
[jschmidlein@wc.com](mailto:jschmidlein@wc.com)  
[sdavidoff@wc.com](mailto:sdavidoff@wc.com)  
[wwigen@wc.com](mailto:wwigen@wc.com)

***Attorneys for Defendants Takata  
Corporation and TK Holdings, Inc.***

JENNER & BLOCK LLP

Dated: April 20, 2015

By: /s/ Terrence J. Truax

Terrence J. Truax  
Charles B. Sklarsky  
Michael T. Brody  
Gabriel A. Fuentes  
Daniel T. Fenske  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654-3456  
(312) 222-9350  
(312) 527-0484 (facsimile)  
[ttruax@jenner.com](mailto:ttruax@jenner.com)  
[csklarsky@jenner.com](mailto:csklarsky@jenner.com)  
[mbrody@jenner.com](mailto:mbrody@jenner.com)  
[gfuentes@jenner.com](mailto:gfuentes@jenner.com)  
[dfenske@jenner.com](mailto:dfenske@jenner.com)

Gary K. August  
ZAUSMER, AUGUST & CALDWELL,  
P.C.  
31700 Middlebelt Road  
Suite 150  
Farmington Hills, Michigan 48334-2374  
(248) 851-4111  
[gaugust@zacfirm.com](mailto:gaugust@zacfirm.com)

***Attorneys for Defendants Mitsubishi  
Electric US Holdings, Inc. and Mitsubishi  
Electric Automotive America, Inc.***

JONES DAY

Dated: April 20, 2015

By: /s/ John M. Majoras

John M. Majoras  
Carmen G. McLean  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001-2113

(202) 879-3939  
(202) 626-1700 (facsimile)  
[jmmajoras@jonesday.com](mailto:jmmajoras@jonesday.com)  
[cgmclean@jonesday.com](mailto:cgmclean@jonesday.com)

Michelle K. Fischer  
Stephen J. Squeri  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114  
(216) 586-3939  
(216) 579-0212 (facsimile)  
[mfischer@jonesday.com](mailto:mfischer@jonesday.com)  
[sjsqueri@jonesday.com](mailto:sjsqueri@jonesday.com)

***Attorneys for Defendants Yazaki  
Corporation and Yazaki North America,  
Inc.***

CALFEE, HALTER & GRISWOLD LLP

Dated: April 20, 2015

By: /s/ Maura Hughes

Maura Hughes  
Alexander B. Reich  
Ronald M. McMillan  
CALFEE, HALTER & GRISWOLD  
LLP  
800 Superior Avenue  
Suite 1400  
Cleveland, OH 44114  
(216) 622-8200  
(216) 241-0816 (facsimile)  
[mhughes@calfee.com](mailto:mhughes@calfee.com)  
[areich@calfee.com](mailto:areich@calfee.com)  
[rmcmillan@calfee.com](mailto:rmcmillan@calfee.com)

***Attorneys for Defendants Continental  
Automotive Systems, Inc. & Continental  
Automotive Electronics, LLC***

MAYER BROWN LLP

Dated: April 20, 2015

By: /s/ Andrew S. Marovitz

Andrew S. Marovitz  
Britt M. Miller  
MAYER BROWN LLP  
71 S. Wacker Drive  
Chicago, IL 60606  
(312) 782-0600  
(312) 701-7711 (facsimile)  
[amarovitz@mayerbrown.com](mailto:amarovitz@mayerbrown.com)  
[bmiller@mayerbrown.com](mailto:bmiller@mayerbrown.com)

***Attorneys for Defendant Lear  
Corporation***

SIMPSON THACHER & BARTLETT LLP

Dated: April 20, 2015

By: /s/ Matthew J. Reilly

Matthew J. Reilly  
Abram J. Ellis  
David T. Shogren  
SIMPSON THACHER & BARTLETT  
LLP  
1155 F Street, N.W.  
Washington, DC 20004  
(202) 636-5500  
(202) 636-5502 (facsimile)  
[matt.reilly@stblaw.com](mailto:matt.reilly@stblaw.com)  
[aellis@stblaw.com](mailto:aellis@stblaw.com)  
[dshogren@stblaw.com](mailto:dshogren@stblaw.com)

George S. Wang  
Shannon K. McGovern

SIMPSON THACHER & BARTLETT  
LLP  
425 Lexington Avenue  
New York, New York 10017  
(212) 455-2000  
(212) 455-2502 (facsimile)  
[gwang@stblaw.com](mailto:gwang@stblaw.com)  
[smcgovern@stblaw.com](mailto:smcgovern@stblaw.com)

***Attorneys for Defendants Stanley Electric  
Co., Ltd., Stanley Electric U.S. Co., Inc.  
and II Stanley Co., Inc.***

SIMPSON THACHER & BARTLETT LLP

Dated: April 20, 2015

By: /s/ Matthew J. Reilly

Matthew J. Reilly  
Abram J. Ellis  
David T. Shogren  
SIMPSON THACHER & BARTLETT  
LLP  
1155 F Street, N.W.  
Washington, DC 20004  
(202) 636-5500  
(202) 636-5502 (facsimile)  
[matt.reilly@stblaw.com](mailto:matt.reilly@stblaw.com)  
[aellis@stblaw.com](mailto:aellis@stblaw.com)  
[dshogren@stblaw.com](mailto:dshogren@stblaw.com)

George S. Wang  
Shannon K. McGovern  
SIMPSON THACHER & BARTLETT  
LLP  
425 Lexington Avenue  
New York, New York 10017  
(212) 455-2000  
(212) 455-2502 (facsimile)  
[gwang@stblaw.com](mailto:gwang@stblaw.com)  
[smcgovern@stblaw.com](mailto:smcgovern@stblaw.com)



Timothy J. Lowe  
McDONALD HOPKINS PLC  
39533 Woodward Ave., Ste. 318  
Bloomfield Hills, MI 48304  
(248) 220-1359  
[tlowe@mcdonaldhopkins.com](mailto:tlowe@mcdonaldhopkins.com)

***Attorneys for Defendants Diamond  
Electric Mfg. Co., Ltd. and Diamond  
Electric Mfg. Corporation***

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

Dated: April 20, 2015

By: /s/ Jeremy Calsyn  
Jeremy Calsyn  
CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 974-1552  
(202) 974-1999 (facsimile)  
[jcalsyn@cgsh.com](mailto:jcalsyn@cgsh.com)

DYKEMA GOSSETT PLLC

Dated: April 20, 2015

By: /s/ Howard Iwrey  
Howard Iwrey  
DYKEMA GOSSETT PLLC  
39577 Woodward Ave., Suite 300  
Bloomfield Hills, MI 48304  
(248) 203-0526  
(248) 203-0763 (facsimile)  
[hiwrey@dykema.com](mailto:hiwrey@dykema.com)

***Attorneys for Defendants Aisin Seiki Co.,  
Ltd. and Aisin Automotive Casting, LLC***

LANE POWELL PC

Dated: April 20, 2015

By: /s/ Larry S. Gangnes

Larry S. Gangnes  
LANE POWELL PC  
1420 Fifth Ave., Suite 4200  
P.O. Box 91302  
Seattle, WA 98111-9402  
Telephone: (206) 223-7000  
Facsimile: (206) 223-7107  
[gangnesl@lanepowell.com](mailto:gangnesl@lanepowell.com)

Craig D. Bachman  
Kenneth R. Davis II  
Darin M. Sands  
Masayuki Yamaguchi  
Peter D. Hawkes  
LANE POWELL PC  
601 SW Second Ave., Suite 2100  
Portland, OR 97204-3158  
Telephone: (503) 778-2100  
Facsimile: (503) 778-2200  
[bachmanc@lanepowell.com](mailto:bachmanc@lanepowell.com)  
[davisk@lanepowell.com](mailto:davisk@lanepowell.com)  
[sandsd@lanepowell.com](mailto:sandsd@lanepowell.com)  
[yamaguchim@lanepowell.com](mailto:yamaguchim@lanepowell.com)  
[hawkesp@lanepowell.com](mailto:hawkesp@lanepowell.com)

Richard D. Bisio (P30246)  
Ronald S. Nixon (P57117)  
KEMP KLEIN LAW FIRM  
201 W. Big Beaver, Suite 600  
Troy, MI 48084  
Telephone: (248) 528-1111  
Facsimile: (248) 528-5129  
[richard.bisio@kkue.com](mailto:richard.bisio@kkue.com)  
[ron.nixon@kkue.com](mailto:ron.nixon@kkue.com)

***Attorneys for Defendants Furukawa  
Electric Co., Ltd. and American Furukawa,  
Inc.***

LANE POWELL PC

Dated: April 20, 2015

By: /s/ Kenneth R. Davis II

Craig D. Bachman  
Kenneth R. Davis II  
Darin M. Sands  
Masayuki Yamaguchi  
Peter D. Hawkes  
601 SW Second Avenue, Suite 2100  
Portland, OR 97204-3158  
Telephone: 503.778.2100  
[bachmanc@lanepowell.com](mailto:bachmanc@lanepowell.com)  
[davisk@lanepowell.com](mailto:davisk@lanepowell.com)  
[sandsd@lanepowell.com](mailto:sandsd@lanepowell.com)  
[yamaguchim@lanepowell.com](mailto:yamaguchim@lanepowell.com)  
[hawkesp@lanepowell.com](mailto:hawkesp@lanepowell.com)

Larry S. Gangnes  
LANE POWELL PC  
1420 Fifth Avenue, Suite 4100  
P.O. Box 91302  
Seattle, WA 98111-9402  
Telephone: 206.223.7000  
[gangnesl@lanepowell.com](mailto:gangnesl@lanepowell.com)

Richard D. Bisio (P30246)  
Ronald S. Nixon (P57117)  
KEMP KLEIN LAW FIRM  
201 W. Big Beaver, Suite 600  
Troy, MI 48084  
Telephone: 248.528.1111  
[richard.bisio@kkue.com](mailto:richard.bisio@kkue.com)  
[ron.nixon@kkue.com](mailto:ron.nixon@kkue.com)

***Attorneys for Defendants Nachi-Fujikoshi  
Corp. and Nachi America, Inc.***

DYKEMA GOSSETT PLLC

Dated: April 20, 2015

By: /s/ Howard B. Iwrey

James P. Feeney (P13335)  
Howard B. Iwrey (P39635)  
DYKEMA GOSSETT PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304  
248 203-0526  
Fax: 248-203-0763  
[jfeeney@dykema.com](mailto:jfeeney@dykema.com)  
[hiwrey@dykema.com](mailto:hiwrey@dykema.com)

***Attorneys for Defendants TRW  
Deutschland Holding GmbH and TRW  
Automotive Holdings Corp.***

WINSTON & STRAWN LLP

Dated: April 20, 2015

By: /s/ Jeffrey L. Kessler

Jeffrey L. Kessler  
Eva W. Cole  
A. Paul Victor  
WINSTON & STRAWN LLP  
200 Park Ave.  
New York, NY 10166-4193  
(212) 294-6700  
(212) 294-4700 (facsimile)  
[jkessler@winston.com](mailto:jkessler@winston.com)  
[ewcole@winston.com](mailto:ewcole@winston.com)  
[pvictor@winston.com](mailto:pvictor@winston.com)

***Attorneys for Defendants Panasonic  
Corporation and Panasonic Corporation of  
North America***

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2015, I electronically filed the foregoing Opposition to Motion to Intervene with the Clerk of the Court using the ECF system which will send notification of such filing to the ECF participants.

Dated: April 20, 2015

By: /s/ Steven A. Reiss

Steven A. Reiss  
Adam C. Hemlock  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153-0119  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
steven.reiss@weil.com  
adam.hemlock@weil.com

***Attorneys for Bridgestone Corporation and  
Bridgestone APM Company***